REMARKS

This Application has been carefully reviewed in light of the Office Action mailed June 27, 2006. Claims 1-25 were pending in the Application. In the Office Action, Claims 1-25 were rejected. Applicants respectfully request reconsideration and favorable action in this case.

In the Office Action, the following actions were taken or matters were raised:

SECTION 112 REJECTIONS

Claims 2-4, 8 and 25 are rejected under 35 U.S.C. §112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicant regards as the invention. Specifically, the Examiner believes that Applicant intended to recite "the" at various locations in Claims 2-4, 8 and 25. Applicant respectfully submits that Claims 2-4, 8 and 25 are written as intended by Applicant and that the absence of the word "the" at the locations indicated by the Examiner does not render Claims 2-4, 8 and 25 indefinite. However, in order to advance and expedite prosecution of the present Application, Applicant has amended Claims 2-4, 8 and 25 as suggested by the Examiner. Applicant respectfully submits that these amendments to Claims 2-4, 8 and 25 are not made based on any cited or applied art and, therefore, do not narrow or otherwise change the scope of Claims 2-4, 8 and 25. Applicant respectfully requests that this rejection be withdrawn.

SECTION 102 REJECTIONS

Claims 1, 4, 7 and 9-23 were rejected under 35 U.S.C. 102(b) as being anticipated by U.S. Patent No. 5,513,365 issued to Cook et al. (hereinafter "*Cook*"). Applicant respectfully traverses this rejection.

Of the rejected claims, Claims 1, 11, 16 and 23 are independent. Applicant respectfully submits that *Cook* does not disclose or even suggest each and every limitation of independent Claims 1, 11, 16 and 23. For example, independent Claim 1, as amended, recites "receiving, by a computer system, an input/output request formatted in accordance with an application programming interface <u>unavailable on the computer system</u>" and "generating an input/output request formatted in accordance with an adapter interface layer" (emphasis added). *Cook* appears to disclose three applications 600, 605 and 610 of a system <u>having respective APIs 615, 620 and 625</u> which contain and utilize drivers 616, 621 and 626 to communicate with and

dynamically bind with respective device driver libraries 660, 670 and 680, where the driver libraries 660, 670 and 680 are programmed to interface with, and utilize an adapter interface layer 700 of the *Cook* system (*Cook*, column 3, lines 45-67, column 4, lines 1-5, figure 4). Thus, *Cook* appears to disclose that the application programming interfaces in *Cook*, namely, APIs 615, 620 and 625, are, in fact, <u>available on the *Cook* system</u>. Therefore, for at least this reason, Applicant respectfully submits that *Cook* does not anticipate Claim 1.

Independent Claim 11, as amended, recites "receiving, by a translation layer comprising a set of computer-readable instructions, an input/output request formatted in accordance with an application programming interface <u>unavailable on the computer system</u>" (emphasis added), and independent Claim 16, as amended, recites "a local interface communicatively coupling the processing element and the host adapter, the processing element operable to . . . receive an input/output request formatted in accordance with an application programming interface <u>unavailable on the computer system</u>" (emphasis added). At least for the reasons discussed above in connection with independent Claim 1, Applicant respectfully submits that *Cook* also does not anticipate independent Claims 11 and 16.

Independent Claim 23 recites "receiving an input/output request formatted in accordance with an application programming interface <u>unsupported by an operating system of the computer system</u>" (emphasis added). In the Office Action, the Examiner does not appear to address at least the above-referenced limitation recited by Claim 23 and, instead, appears to reject Claim 23 for the reasons set forth for Claim 1 (which does not recite "unsupported by an operating system") (Office Action, page 6). At least for the reasons discussed above in connection with independent Claim 1, Applicant respectfully submits that *Cook* does not disclose or even suggest "receiving an input/output request formatted in accordance with an application programming interface <u>unsupported by an operating system of the computer system</u>" as recited by Claim 23 (emphasis added). Therefore, *Cook* also does not anticipate Claim 23.

Claims 4, 7, 9, 10, 12-15 and 17-22 that depend respectively from independent Claims 1, 11 and 16 are also not anticipated by *Cook* at least because they incorporate the limitations of respective Claims 1, 11 and 16 and also add additional elements that further distinguish *Cook*. Therefore, Applicant respectfully requests that the rejection of Claims 1, 4, 7 and 9-23 be withdrawn.

SECTION 103 REJECTIONS

Claim 8 was rejected under 35 U.S.C. 103(a) as being unpatentable over *Cook* as applied to Claim 7. Claims 2, 3 and 24 were rejected under 35 USC 103(a) as being unpatentable over *Cook* as applied to claim 1 in further view of U.S. Patent No. 5,339,421 issued to Housel, III (hereinafter "*Housel*"). Claim 5 is rejected under 35 USC §103(a) as being unpatentable over *Cook* as applied to Claim 1 and further in view of U.S. Patent Application No. 5,442,789 issued to Baker et al. (hereinafter "*Baker*"). Claim 6 was rejected under 35 USC §103(a) as being unpatentable over *Cook*, *Housel* and *Baker* as applied to claims 2 and 5. Claim 25 was rejected under 35 USC §103(a) as being unpatentable over *Cook* as applied to Claim 1 and further in view of U.S. Patent No. 6,327,613 issued to Goshey et al. ("*Goshey*"). Applicant respectfully traverses these rejections.
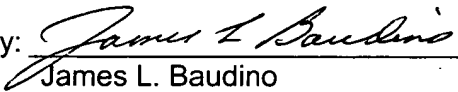
Claims 2, 3, 5, 6, 8, 24 and 25 depend respectively from independent Claims 1 and 23. as discussed above, independent Claims 1 and 23 are allowable. Therefore, Claims 2, 3, 5, 6, 8, 24 and 25 that depend respectively therefrom are also allowable. Further, none of *Housel*, *Baker* or *Goshey* appear to remedy at least the deficiencies of *Cook* discussed above. Therefore, Applicant respectfully requests that the rejection of Claims 2, 3, 5, 6, 8, 24 and 25 be withdrawn.

<u>CONCLUSION</u>

Applicant has made an earnest attempt to place this case in condition for immediate allowance. For the foregoing reasons and for other reasons clearly apparent, Applicant respectfully requests reconsideration and full allowance of all pending claims.

No fee is believed due with this Response. If, however, Applicant has overlooked the need for any fee due with this Response, the Commissioner is hereby authorized to charge any fees or credit any overpayment associated with this Response to Deposit Account No. 08-2025 of Hewlett-Packard Company.

Respectfully submitted,

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